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18 GOOGLE LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**[PROPOSED] ORDER GRANTING
OMNIBUS MOTION TO SEAL
PORTIONS OF PLAINTIFFS'
OPPOSITION TO GOOGLE LLC'S
MOTION FOR SUMMARY JUDGMENT
AND GOOGLE LLC'S REPLY IN
SUPPORT**

(CIVIL LOCAL RULE 79-5)

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor
Action Filed: July 14, 2020
Trial Date: February 10, 2025

1 The following chart identifies the exhibits to Plaintiffs' Opposition to Google's
2 Motion for Summary Judgment (Dkt. 398).

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Exhibit	Bates No. / Pages with Designations	Description
3 4 5 6 7 8 9 10 11 12	GOOG-RDGZ-00210316	Internal term
	GOOG-RDGZ-00210317	Employee PII
	GOOG-RDGZ-00210318	Internal strategy
	GOOG-RDGZ-00210321	Internal strategy
	GOOG-RDGZ-00210322	Internal strategy
	GOOG-RDGZ-00210324	Internal strategy
	GOOG-RDGZ-00210328, GOOG-RDGZ-00210330 to GOOG-RDGZ-00210332	Internal processes
	GOOG-RDGZ-00210333 to GOOG-RDGZ-00210334	Internal processes, Internal strategy
	GOOG-RDGZ-00210335	Internal strategy
	GOOG-RDGZ-00210336	Internal strategy
13 14 15	GOOG-RDGZ-00210339 to GOOG-RDGZ-00210340	Internal strategy
	GOOG-RDGZ-00210341	Internal strategy
	GOOG-RDGZ-00210342	Internal strategy

1	GOOG-RDGZ-00210345 to GOOG-RDGZ-00210350	Internal strategy	
2	GOOG-RDGZ-00210355	Internal strategy	
3	GOOG-RDGZ-00210359 to GOOG-RDGZ-00210362	Internal processes, Internal strategy	
4	GOOG-RDGZ-00210363	Internal processes, Internal strategy	
5	GOOG-RDGZ-00210364	Internal processes	
6	Exhibit 34	GOOG-RDGZ-00033245	Employee PII, Internal strategy
7	Exhibit 44	GOOG-RDGZ-00030007.R (entire document)	Internal processes, Internal Strategy
8	Exhibit 45	GOOG-RDGZ-00029866 (entire document)	Internal processes, Internal names, Internal strategy
9	Exhibit 49	GOOG-RDGZ-00188469 (Entire document)	Internal processes, Internal names, Internal strategy
10	Exhibit 56	GOOG-RDGZ-00181440 (Entire document)	Internal processes, Internal names, Internal strategy
11	Exhibit 63	GOOG-RDGZ-00025811 (Entire document)	Internal strategy
12	Exhibit 66	GOOG-RDGZ-00020692, GOOG-RDGZ-00020697, GOOG-RDGZ-00020698	Internal term Pi***
13	Exhibit 67	GOOG-RDGZ-00021161	Internal strategy

1	GOOG-RDGZ-00021162	Internal strategy
2	GOOG-RDGZ-00021163	Internal strategy
3	GOOG-RDGZ-00021164	Internal strategy
4	GOOG-RDGZ-00021167	Internal strategy
5	GOOG-RDGZ-00021168	Internal strategy
6	GOOG-RDGZ-00021169	Internal strategy
7	GOOG-RDGZ-00021171 to GOOG-RDGZ-00021181, GOOG-RDGZ-00021191 to GOOG-RDGZ-00021196, GOOG-RDGZ-00021198 to GOOG-RDGZ-00021202, GOOG-RDGZ-00021204 to GOOG-RDGZ-00021208, GOOG-RDGZ-00021210 to GOOG-RDGZ-00021211. GOOG-RDGZ-00021213 to GOOG-RDGZ-00021216	Internal strategy
8	GOOG-RDGZ-00021218	Internal strategy
9	GOOG-RDGZ-00021220	Internal strategy
10	GOOG-RDGZ-00021221	Internal strategy
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1		GOOG-RDGZ-00021224	Internal strategy
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3	Exhibit 68	GOOG-RDGZ-00151484 (Entire document)	Internal strategy, internal terms
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5	Exhibit 76	224:18-225:7, 227:12-13, 17-18	Internal processes
6			
7	Exhibit 77	GOOG-RDGZ-00092072	Employee PII
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9		GOOG-RDGZ-00092078 to GOOG-RDGZ-00092088	Internal strategy
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11		GOOG-RDGZ-00092090 to GOOG-RDGZ-00092095	Internal strategy
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13		GOOG-RDGZ-00092097 to GOOG-RDGZ-00092101	Internal strategy (previously filed with court-ordered redactions at 361-36)
14			
15		GOOG-RDGZ-00092102 to GOOG-RDGZ-00092109	Internal strategy
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17		GOOG-RDGZ-00092110	Internal strategy
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19		GOOG-RDGZ-00092112	Internal strategy
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21		GOOG-RDGZ-00092120	Internal strategy
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1	Exhibit E to Google's Reply	p. 99, lines 1, 7-10, 20, 23, 25; p. 100, line 9	Internal term Na***
2		p. 100, lines 7, 12	Internal term Ec***
3	Exhibit F to Google's Reply	p. 96, line 8	Internal term lo***
4		p. 96, lines 19-21	Internal term Ra***
5	Exhibit G to Google's Reply		Internal processes
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1 IT IS SO ORDERED.

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3 DATED: _____
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5 Honorable Richard Seeborg
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Honorable Richard Seeborg
Chief United States District Judge